

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re:

Erin Owens  
Debtor

Case No.10-53504 wsd  
Chapter 13  
Honorable Walter Shapero

Erin Owens  
Plaintiff

Adv. Proc. No.10-05320

v.

Bank of America  
Defendant

**APPLICATION FOR ENTRY OF DEFAULT JUDGMENT AGAINST BANK OF  
AMERICA**

Plaintiff, Erin L.Owens, through counsel and pursuant to Fed. R. Bankr. P. 7055 and L.B.R. 7055-1 (E.D.M.), submits this application (this "Application") for the entry of a judgment, substantially in the form attached as *Exhibit A* (the "Judgment"), against Bank of America and respectfully states as follows:

1. On June 2, 2010, a Default Entry by Clerk, a copy which is attached as *Exhibit B*, was entered in the above captioned adversary proceeding.
2. Plaintiff obtained an appraisal which is attached as *Exhibit C* that indicates the value of the property in the Adversary Proceeding is less than the first mortgage.
3. Defendant failed to timely and properly plead or otherwise defend as provided by the Federal Rules of Bankruptcy Procedure, and that fact is made to appear by the *Affidavit of Robert Keyes*, attached as Exhibit D, in support of this Application.

WHEREFORE, Plaintiff requests that this Court to enter the judgment and grant Plaintiff such other and further relief as the Court deems just and proper under the circumstances.

Respectfully Submitted,

Dated:

/s/ John Robert Keyes  
Robert Keyes P68856  
Attorney for Plaintiff  
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Dated: June 10, 2010